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28 Attorneys for Defendants/Counter-Plaintiffs
 1 VARIOUS, INC., *et al.*

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 OAKLAND DIVISION

21 FACEBOOK, INC., Case No. 4:11-cv-01805-SBA (DMR)

22 Plaintiff,

23 v.

24 VARIOUS, INC.; GMCI INTERNET
 25 OPERATIONS, INC.; TRAFFIC CAT, INC.;
 26 FRIENDFINDER NETWORKS INC.; and
 27 DOES 1-100,

28 Defendants.

**JOINT STIPULATION FOR STAY and
 [REDACTED] ORDER**

28 AND RELATED COUNTERCLAIMS

1 Pursuant to Local Rule 7-12, Plaintiff Facebook, Inc. (“Facebook”) and Defendants
 2 Various, Inc., GMCI Internet Operations, Inc., Traffic Cat, Inc. and FriendFinder Networks Inc.
 3 (collectively “Defendants”) hereby stipulate that this case be stayed in favor of continued
 4 settlement discussions between the parties with the continued assistance, as needed, from
 5 Magistrate Judge Jacqueline Scott Corley, which the parties believe are likely to resolve the case.

6 On November 4, 2011 the parties participated in a full day settlement conference with
 7 Magistrate Judge Corley which continued until after 6:00 p.m. and significant progress was made
 8 to resolve all disputes. While meaningful progress toward settlement was made, several issues
 9 require further discussion. The parties believe that continued discussions between the parties will
 10 likely lead to a settlement. It is the parties’ belief that a stay will conserve judicial resources,
 11 economy and time. The parties further believe that a stay of the litigation, including the
 12 December 30, 2011 deadline to amend pleadings or add parties and any and all other deadlines,
 13 will facilitate a settlement. Accordingly, at the suggestion of Magistrate Judge Corley and subject
 14 to the approval of the Court, the parties hereby stipulate that:

- 15 1. This case is stayed indefinitely in favor of continued settlement discussions under the
 16 supervision of Magistrate Judge Corley;
- 17 2. The December 30, 2011 deadline to add parties and amend the complaint is vacated and
 18 will be reset to a later date should the stay be lifted;
- 19 3. All discovery deadlines, including all deadlines for third parties to respond to subpoenas,
 20 are vacated and will be reset to a later date should the stay be lifted;
- 21 4. Any party may lift the stay by first notifying Magistrate Judge Corley and all other parties
 22 and by filing a Notice of Dissolution of Stay five (5) days thereafter; and

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5. The January 12, 2012 case management conference will proceed as scheduled should the case not be resolved before that date.

SO STIPULATED:

Dated: November 7, 2011

COOLEY LLP
JEFFREY T. NORBERG (215087)

/s/ Jeffrey T. Norberg
Jeffrey T. Norberg (215087)
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FACEBOOK, INC.

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/s/ Kristin L. Holland
Kristin L. Holland (187314)
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VARIOUS, INC., et al.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/7/11

Saundra B. Armstrong
The Honorable Saundra Brown Armstrong
United States District Judge

GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from each of the signatories and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

/s/ Jeffrey T. Norberg

Jeffrey T. Norberg
Attorneys for Plaintiff
FACEBOOK, INC.